

John Sullivan  
POST & SCHELL PC  
1600 John F. Kennedy Blvd.  
Philadelphia, PA 19103  
(215) 587-1000

Mark D. Plevin  
Matthew W. Cheney  
Kelly R. Cusick  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2595  
(202) 624-2500

Attorneys for Liberty Mutual Insurance Company and  
Wausau Underwriters Insurance Company

U.S. BANKRUPTCY COURT  
FILED  
CAMDEN, NJ  
08 JUL -7 PM 3:17  
JAMES J. WALDRON  
BY: \_\_\_\_\_  
DEPUTY CLERK

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:	)	Chapter 11
SHAPES/ARCH HOLDINGS L.L.C., <i>et al.</i> ,	)	Case No. 08-14631 (GMB)
Debtors.	)	Hon. Gloria M. Burns

**APPLICATION FOR *PRO HAC VICE* ADMISSION  
OF MATTHEW W. CHENEY, ESQ.**

Liberty Mutual Insurance Company and Wausau Underwriters Insurance Company, parties in interest ("Movants"), through their counsel John Sullivan, a member in good standing of the Bar of the State of New Jersey and admitted to practice before the United States District Court for the District of New Jersey, hereby apply to the Court for an Order permitting Matthew W. Cheney of the law firm of Crowell & Moring LLP ("Applicant") to practice *pro hac vice* before this Court on behalf of Movants. In support of this motion, Movants respectfully represent as follows:

1. Applicant is a counsel with the law firm of Crowell & Moring LLP, maintaining an office at 1001 Pennsylvania Avenue, N.W., Washington, D.C. 20004. As set forth in the attached Certification of Matthew W. Cheney, annexed hereto as Exhibit A, Applicant is a member in good standing of the bars in which he is admitted to practice. Applicant is not under suspension or disbarment by any court.

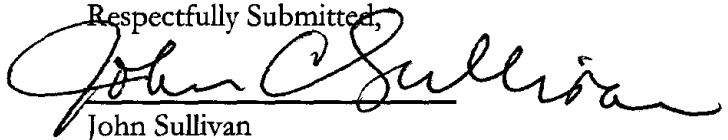
2. If admitted *pro hac vice*, Applicant has represented that he will adhere to the disciplinary jurisdiction of this Court.

3. Movants request that the Court grant this motion so that Applicant can file pleadings and appear and be heard at any hearings in these Chapter 11 cases.

WHEREFORE, it is respectfully requested that the Court grant Movants' application, pursuant to D.N.J. LBR 2090-1 and L.Civ. R. 101.1(c), to admit Applicant *pro hac vice* in these Chapter 11 cases and granting such other relief as is just.

Dated: July 7, 2008

Respectfully Submitted,

A handwritten signature in cursive script, reading "John Sullivan", written over a horizontal line.

John Sullivan  
POST & SCHELL PC  
1600 John F. Kennedy Blvd.  
Philadelphia, PA 19103  
(215) 587-1000

Attorney for Liberty Mutual Insurance  
Company and Wausau Underwriters  
Insurance Company

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DEPUTY CLERK

Four Penn Center  
1600 John F. Kennedy Blvd.  
Philadelphia, PA 19103  
215-587-1000 Main  
215-587-1444 Fax  
www.postschell.com

John C. Sullivan

jsullivan@postschell.com  
215-587-1487 Direct  
215-320-4773 Fax  
File No. 137205

July 7, 2008

VIA HAND DELIVERY

Office of the Clerk  
U.S. Bankruptcy Court for the District of New Jersey  
U.S. Post Office and Courthouse  
401 Market Street - Second Floor  
Camden, NJ 08101

**RE: In re: Shapes/Arch Holdings, L.L.C., et al.**  
**Chapter 11, Case No. 08-14631 (GMB), Hon. Gloria M. Burns**

Dear Sir/Madam:

Enclosed please find the original and one copy of the Application for *Pro Hac Vice* Admission of Matthew W. Cheney, Esquire, a Certificate of Non-Compliance Regarding CM/ECF Filing and a CD containing same in PDF format. Please file the original and return a time-stamped copy of same to the undersigned in the enclosed, self-addressed, stamped envelope.

Thank you for your attention to this matter.

Very truly yours,

John C. Sullivan

JCS/rlb

Enclosures

cc: See Certificate of Service